

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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PAULA BURKE-GREEN-WARREN,

Plaintiff,

Civil Action No.: 3:23-cv  
02082-PGS-DEA

v.

WORLDWIDE FLIGHT SERVICES, INC., INDIGO  
PARTNERS & FRONTIER AIRLINES HOLDINGS,  
INC. d/b/a FRONTIER AIRLINES,

Defendants.

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**MOTION FOR ADMISSION OF KATHRYN GRACE**  
**TO APPEAR *PRO HAC VICE***

Pursuant to New Jersey Local Rule 101.1(c), I, Megan R. Calme-Cappellini, a member in good standing of the Bars of the state of New Jersey and the United States District Court for the District of New Jersey, on behalf of the Defendant Frontier Airlines Holdings, Inc. d/b/a Frontier Airlines (i/p/a “Indigo Partners & Frontier Airlines Holdings, Inc. d/b/a Frontier Airlines”) and Defendant Indigo Partners, LLC (collectively, “Defendants”), respectfully moves for the admission *pro hac vice* of Kathryn Grace (“Applicant”).

As stated in her attached Certification, Kathryn Grace, a member of the Bars of the State of Virginia, District of Columbia, Maryland, West Virginia and North Carolina, seeks admission to this Court, *pro hac vice*, for the purpose of representing Defendants in the above referenced matter. As grounds therefore, Movant states that:

1. Applicant is a member in good standing of the aforementioned courts. See Certification of Kathryn Grace, attached.

2. Applicant is not subject to any disciplinary proceedings as a member of any bar, and has not been disciplined in any manner in any jurisdiction. *See id.*

3. Applicant has read, and is familiar, with the applicable provisions of the Local Rules of the United States District Court for the District of New Jersey. *See id.*

4. Applicant is a partner of the law firm of Wilson, Elser, Moskowitz, Edelman & Dicker, LLP in its McLean, Virginia Office located at 8444 Westpark Drive, Suite 510, McLean, Virginia 22102.

5. Megan R. Calme is an active member in good standing of the Bar of the state of New Jersey, and is counsel of record in this case for Defendants. Attorney Calme is an attorney of the law firm of Wilson, Elser, Moskowitz, Edelman & Dicker, LLP located at 3102 West End Avenue Suite 400, Nashville, TN 37302.

WHEREFORE, Defendants through undersigned counsel, respectfully request that Applicant Kathryn Grace be admitted to practice before this Court *pro hac vice* for the purpose of appearing as its counsel of choice in the above-captioned matter in accordance with the Rules of this Court.

**WILSON ELSEER MOSKOWITZ  
EDELMAN & DICKER, LLP**

/s/ Megan R. Calme-Cappellini  
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**CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that a true and correct copy of this pleading has been served via notification by the Court's e-filing system and via electronic mail, this the 29<sup>th</sup> day of August 2023, upon the following:

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/s/ Megan Calme-Cappellini  
Megan R. Calme-Cappellini